BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

In the Matter of)
)	
Amendment of Part 90 of the Commission Rule	es)) WP Docket No. 07-100

COMMENTS OF THE VILLAGE OF RIVER FOREST, ILLINOIS FIRE DEPARTMENT

I. INTRODUCTION

The Illinois Fire Chiefs Association provides these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-85, adopted by the Commission on May 9, 2007.

II. DISCUSSION

The Illinois Fire Chiefs Association is dedicated to promoting excellence in the fire service by providing a network of information sharing and opportunities to our diverse membership and associated partnerships through education, legislation, and technical means. The Illinois Fire Chiefs Association represents 1,209 members composed of full-time, part-time, and volunteer offers across the great State of Illinois. In representing our members, the Illinois Fire Chiefs Association would like to offer the following comments regarding this NPRM.

Paragraph 4. The fire service in Illinois has a long history of using paging on the voice channels. This is done for alerting primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, alerting off duty personnel to respond, alerting call back personnel for station coverage and making announcements of interest to surrounding departments or personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the fire service in Illinois. The FCC acknowledges that "paging and voice operations can generally co-exist on the same channel in the same area, provided the paging transmissions are infrequent (low traffic volume) and the paging licensee monitors the channel prior to transmitting." Loss of this paging capability would be a financial burden for the fire departments of Illinois to bear to implement another method for our alerting needs. It could also delay their responses when personnel are out of quarters.

Paragraph 5. The fire service in Illinois has a long history of using paging on the voice channels. MABAS has designated two primary VHF voice channels (154.265 MHz and 154.3025 MHz) for statewide interoperable communications for mutual aid purposes. The

primary means of alerting fire departments state wide of a mutual aid emergency is using paging tones on these frequencies. Every increase in alarm and even the striking out of the box or extra alarm incidents is preceded by the activation of the statewide tones on the voice channel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the fire service in Illinois. The FCC acknowledges that "paging and voice operations can generally co-exist on the same channel in the same area, provided the paging transmissions are infrequent (low traffic volume) and the paging licensee monitors the channel prior to transmitting." The loss of the paging capability would be devastating to a mutual aid system that has continued to grow since its inception in 1969, to where it is expanding into surrounding states (Wisconsin, Indiana and Iowa). There is no simple solution to replace this tried and true method of alerting the hundreds of fire departments across this state in the event of an emergency that out strips any one department's capacity to handle. It would be a serious financial burden on the departments of MABAS in Illinois to implement some other resource to replace the paging system that we now use so effectively.

Paragraph 6. The fire service in Illinois has a long history of using paging on the voice channels. This is done for alerting our primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, and making announcements of interest to our stations or personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to our department.

Paging on mutual aid frequencies in Illinois is critically important and should be maintained as an option on the voice channels. The Illinois Fire Service has a state-wide fire mutual aid system that uses a common frequency (154.265 MHz and 154.3025 MHz)) which uses radio frequency paging for notification of alarm activation and units due to respond. MABAS is recognized as a model for fire service mutual aid and is being copied by other states to facilitate the sharing of resources for fire and rescue emergencies. The Illinois Fire Chiefs Association feels that the implementation of any restrictions would be detrimental to the existing departments and stifle the growth of the very valuable mutual aid system and the interoperable radio system that has been put in place. The elimination or restriction of paging on the mutual aid frequencies would severely impact this operation across the state of Illinois and other surrounding states. Any restrictions would be a serious impact on the current MABAS operations. It would also cause a financial hardship to find and put into service another method of alerting hundreds of departments across the State of Illinois and other neighboring states that are implementing the MABAS program.

IV. CONCLUSION

The Illinois Fire Chiefs Association is opposed to any restrictions that might be imposed on the local or mutual aid VHF frequencies as described above.

Respectfully Submitted,

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